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*Attorneys for Defendant Vidocq Society*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

V.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, VIDOCQ SOCIETY,  
CITY OF COQUILLE, CITY OF COOS  
BAY, and COOS COUNTY,

Defendants.

Civil Case No. 6:20-CV-01163-MK  
(Lead Case)

DEFENDANT VIDOCQ SOCIETY'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFFS' SECOND SET OF  
REQUESTS FOR PRODUCTION

DEF VIDOCQ SOCIETY'S OBJECTIONS &  
RESPONSES TO PLAINTIFFS' SECOND SET OF  
REQUESTS FOR PRODUCTION-Page 1

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17. Vidocq objects to Plaintiffs' definition of "Grievance" to pertain to individuals or entities other than Richard Walter, the individual Vidocq Defendant, and to include "any criticism or complaint" as overbroad, vague, ambiguous, confusing, and unduly burdensome. Defendant will interpret "Grievance" to refer to Richard Walter, the individual Vidocq Defendant, and any complaint if any made as to Richard Walter, the individual Vidocq Defendant pertaining to the Freeman Kidnapping/Murder Investigation.

18. Vidocq incorporates by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, Vidocq does not waive its right to amend the responses.

19. Vidocq's has made a comprehensive and good-faith effort to fully respond to these Requests for Production. The specific responses provided may be responsive to more than one particular request. These responses are not intended to limit Vidocq in any way from relying upon these identified documents as being responsive to other requests and for other purposes.

## **SECOND SET OF REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 46:** Produce all minutes of meetings of Vidocq Society's board of directors, including all committee reports, that occurred between the years 2000 and 2011, and between the years 2017 and 2021.

**RESPONSE:** Defendant Vidocq objects to this request on the grounds it is overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence. Defendant Vidocq also objects to the extent the requested documents include private and confidential financial information regarding its operations. Defendant Vidocq further objects to the extent this request seeks information protected by the attorney client privilege and/or work product doctrine. Without waiving this or any other objection, Defendant Vidocq responds as follows:

DEF VIDOCQ SOCIETY'S OBJECTIONS &  
RESPONSES TO PLAINTIFFS' SECOND SET OF  
REQUESTS FOR PRODUCTION-Page 6

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**unduly burdensome and duplicative of prior discovery requests. Defendant Vidocq further objects to the extent this request seeks information protected by the attorney client privilege and/or work product doctrine. Without waiving this or any other objection, Defendant Vidocq responds as follows:**

Defendant Vidocq has already produced all responsive documents. Upon a further comprehensive search, Defendant Vidocq supplements its prior responses. See attached VIDOQC BATES Nos. 00-1982-002016.

**REQUEST FOR PRODUCTION NO. 55:** To the extent not produced in response to Requests 46 through 50 above, produce all documents mentioned or referred to in pp. 17-20, 36, 48, 50-52, 70, 75, 77, 86-87, 90, 106-107, 111-112, 144, and 172, of the transcript of the Deposition of Barbara Cohan-Saavedra, copies of which are attached for reference.

**RESPONSE:** Defendant Vidocq objects to this request on the grounds it is vague and ambiguous, overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence. Defendant Vidocq further objects on the grounds that the requested notes are protected by the attorney-client privilege and/or work product doctrine. Without waiving this or any other objection, defendant Vidocq responds as follows:

No additional responsive documents exist.

DATED this 26<sup>th</sup> day of June, 2024.

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BY /s/ Meredith A. Sawyer  
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